

MILMAN LABUDA LAW GROUP PLLC

3000 MARCUS AVENUE
SUITE 3W8
LAKE SUCCESS, NY 11042

TELEPHONE (516) 328-8899
FACSIMILE (516) 328-0082

April 17, 2023

VIA ECF

United States District Court
Eastern District of New York
Attn: Hon. Lois Bloom, U.S.M.J.
225 Cadman Plaza East
Courtroom 11A South
Brooklyn, NY 11201-1804

Re: Stidhum v. 161-10 Hillside Auto Ave, LLC, et al.
Case No.: 1:21-cv-7163 (HG) (RLM)
MLLG File No.: 94-2019

Dear Judge Bloom:

This firm represents the Defendants, 161-10 Hillside Auto Ave., LLC d/b/a Hillside Auto Outlet (hereinafter “Hillside Auto Outlet”), Hillside Automall Inc d/b/a Hillside Auto Mall (hereinafter “Hillside Auto Mall”) (Hillside Auto Outlet and Hillside Automall collectively hereinafter the “Corporate Defendants”), Ishaque Thanwalla (hereinafter “Thanwalla”), Jory Baron (hereinafter “Jory”), Ronald M. Baron (hereinafter “Baron”), and Andris Guzman (hereinafter “Guzman”) (Thanwalla, Jory, Baron, and Guzman hereinafter “Individual Defendants”) (the Corporate Defendants and Individual Defendants collectively hereinafter the “Defendants”) in the above-referenced case.

Defendants write to oppose Plaintiff’s request for leave to file a reply. Plaintiff sought “weekly commission sales logs pertaining to car sales of Plaintiff and comparators from August 25, 2018 to January 24, 2019.” However, that request was denied.¹ Moreover, Defendants already provided a log of *each* sale made and supplemented this production today for the one missing month of January 2019. Any other evidence of sales sought is both cumulative and extremely burdensome. Discovery has to come to an end!

Defendants thank this Court for its time and attention to this matter.

¹ See Text Only Order dated April 3, 2023.

Dated: Lake Success, New York
April 17, 2023

Respectfully submitted,

MILMAN LABUDA LAW GROUP PLLC

/s/ Emanuel Kataev, Esq.
Emanuel Kataev, Esq.
3000 Marcus Avenue, Suite 3W8
Lake Success, NY 11042-1073
(516) 328-8899 (office)
(516) 303-1395 (direct dial)
(516) 328-0082 (facsimile)
emanuel@mllaborlaw.com

Attorneys for Defendants

VIA ECF

Troy Law, PLLC

Attn: John Troy, Tiffany Troy, and Aaron Schwietzer, Esqs.

4125 Kissena Boulevard, Suite 103

Flushing, NY 11355-3101

johntroy@troypllc.com

tiffanytroy@troypllc.com

troylaw@troypllc.com

Attorneys for Plaintiff